

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DAILY NEWS, LP; CHICAGO TRIBUNE  
COMPANY, LLC; ORLANDO SENTINEL  
COMMUNICATIONS COMPANY, LLC;  
SUN-SENTINEL COMPANY, LLC; SAN  
JOSE MERCURY-NEWS, LLC; DP MEDIA  
NETWORK, LLC; ORB PUBLISHING, LLC;  
AND NORTHWEST PUBLICATIONS, LLC,

Plaintiffs,

v.

MICROSOFT CORPORATION; OPENAI,  
INC.; OPENAI LP; OPENAI GP, LLC;  
OPENAI, LLC; OPENAI OPCO, LLC;  
OPENAI GLOBAL, LLC; OAI  
CORPORATION, LLC; and OPENAI  
HOLDINGS, LLC,

Defendants.

Case No. 1:24-cv-03285-SHS

**AFFIDAVIT OF LAURA NAJEMY IN SUPPORT OF  
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

COUNTY OF SUFFOLK )  
 ) :ss  
COMMONWEALTH OF MASSACHUSETTS )

Laura Najemy, being duly sworn, deposes and says as follows:

1. I am a Partner with the law firm of Orrick, Herrington & Sutcliffe LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned action.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the Commonwealth of Massachusetts.
4. There are no pending disciplinary proceedings against me in any State or Federal court.

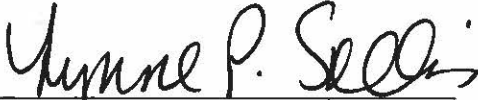
5. I have not been convicted of a felony.

6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.

7. Wherefore I, Laura Najemy, respectfully submit that I be permitted to appear as counsel and advocate *pro hac vice* in this action for Defendant Microsoft Corporation.

  
Laura Najemy

Sworn to before me  
this 22<sup>nd</sup> day of May, 2024

  
Notary Public

